

CLEARY GOTTLIEB STEEN & HAMILTON LLP

One Liberty Plaza
 New York, NY 10006-1470
 T: +1 212 225 2000
 F: +1 212 225 3999
clearygottlieb.com

WASHINGTON, D.C. • PARIS • BRUSSELS • LONDON • MOSCOW
 FRANKFURT • COLOGNE • ROME • MILAN • HONG KONG
 BEIJING • BUENOS AIRES • SÃO PAULO • ABU DHABI • SEOUL

STEVEN M. LOEB	BENET J. O'REILLY
CRAIG B. BROD	ADAM E. FLEISHER
NICOLAS GRABAR	SEAN A. O'NEAL
DAVID E. BRODSKY	GLENN P. MCGRORY
RICHARD J. COOPER	MATTHEW P. SALERNO
JEFFREY S. LEWIS	MICHAEL J. ALBANO
PAUL J. SHIM	VICTOR L. HOU
STEVEN L. WILNER	ROGER A. COOPER
ANDRES DE LA CRUZ	JENNIFER KENNEDY PARK
DAVID C. LOPEZ	ELIZABETH LENAS
MICHAEL A. GERSTENZANG	LUKE A. BAREFOOT
LEV L. DASSIN	JONATHAN S. KOLODNER
JORGE U. JUANTORENA	DANIEL ILAN
MICHAEL D. WEINBERGER	MEYER H. FEIDIA
DAVID LEINWAND	ADRIAN R. RIPPLE
DIANA M. MANN	ELIZABETH VIEHES
JEFFREY A. ROSENTHAL	ADAM J. BRENNEMAN
MICHAEL D. DAYAN	ARD M. MACKNINON
GARMINE D. BOGOUZZI, JR.	JAMES E. LANGSTON
JEFFREY D. KARP	JARED GERBER
KIMBERLY BROWN BLACKLOW	COLIN D. LLOYD
ROBERT J. RAYMOND	COREY M. GOODMAN
FRANCISCO L. CESTERO	RISHI ZUTSHI
FRANCESCA L. ODELL	JANE VANLARE
WILLIAM L. MCRAE	DAVID H. HERRINGTON
JASON FACTOR	KIMBERLY R. SPOERRI
JOON H. KIM	AARON J. MEYERS
MARGARET S. PEPPONIS	DANIEL C. REYNOLDS
LISA M. SCHWEITZER	AUDRY X. CASUSOL
DUANE MCLAUGHLIN	ABENA A. MAINOO
BREON S. PEACE	HUGH C. CONROY, JR.
CHANTAL E. KORDULA	JOSEPH LANZKRON

D: +1 212-225-2086
jrosenthal@cgsh.com

March 10, 2021

VIA ECF

The Honorable Alison J. Nathan
 United States District Judge
 United States District Court for the Southern District of New York
 Daniel Patrick Moynihan Courthouse
 500 Pearl Street
 New York, NY 10007

Re: *In re Application of Benjamin Steinmetz for an Order to Take Discovery from Vale S.A., Vale Americas Inc., Rio Tinto plc, and Rio Tinto Limited Pursuant to 28 U.S.C. § 1782, Case No. 20-mc-00212-AJN (S.D.N.Y.)*
 (the “Application”)

Dear Judge Nathan:

We write on behalf of Respondents Vale S.A. and Vale Americas Inc. (collectively, “Vale”) to further apprise the Court with regard to the underlying foreign proceeding before the High Court of England and Wales (the “High Court”), captioned Vale S.A. v. Steinmetz, No. CL-2019-000723 (the “English Proceedings”), in which both Petitioner Benjamin Steinmetz (“Steinmetz”) and Respondent Vale S.A. are parties.

As we advised the Court on October 22, 2020, the parties appeared before Mr. Justice Baker of the High Court that day for a Case Management Conference (“CMC”). See ECF No. 53. At the CMC, the High Court set a deadline of March 22, 2021 for the conclusion of document productions in the English Proceedings. The parties have made subsequent appearances before and submissions to the High Court to address discovery disputes.

Hon. Alison J. Nathan, p. 2

The document disclosure process in the English Proceedings is proceeding on the timeline ordered by the High Court, and we expect that Vale will provide its disclosure as anticipated by March 22, 2021.

Respectfully submitted,

/s/ Jeffrey A. Rosenthal

Jeffrey A. Rosenthal

cc: All Counsel of Record (via ECF)